

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LAMONT MIKELL,

Plaintiff,

V.

FORREST STAFFING SOLUTIONS,
GREG BOUDREAU, CURTIS
DUMESNIL, HILREY RILEY,
PAM SIBBLE, CHERRIE ROSS,

Defendants.

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Case No.: 14-cv-9595 (VEC)

**NOTICE OF MOTION TO
DISMISS PURSUANT TO
FED. R. CIV. P. 12(b)(6)**

PLEASE TAKE NOTICE that upon the annexed Memorandum of Law in Support of Defendants' Motion to Dismiss the Amended Complaint, the Declaration of Jason B. Klimpl, Esq., sworn to on October 8, 2015, and the exhibit attached thereto, the Defendants will move this Court before the Honorable Valerie E. Caproni, Thurgood Marshall United States Courthouse, Southern District of New York, in Courtroom 443, at 40 Foley Square, New York, NY 10007, at a date and time to be determined by the Court, for an order: (i) granting Defendants' Motion to Dismiss Plaintiff's Amended Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6), with prejudice and without leave to amend, on the grounds that Plaintiff's allegations fail to state a claim for which relief may be granted; and (ii) for such other and further relief as this Court may deem just and proper.

Dated: New York, New York
October 8, 2015

TANNENBAUM HELPERN
SYRACUSE & HIRSCHTRITT LLP

A handwritten signature in blue ink, appearing to read "A. W. Singer", is written over a horizontal line.

By: Andrew W. Singer
Jason B. Klimpl

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Plaintiff Pro Se